

BILAL A. ESSAYLI
First Assistant United States Attorney
ALEXANDER B. SCHWAB
Assistant United States Attorney
Acting Chief, Criminal Division
KYLE W. KAHAN (Cal. Bar No. 298848)
JASON A. GORN (Cal. Bar No. 296179)
KELLYE NG (Cal. Bar No. 313051)
Assistant United States Attorneys
1200/1300/1400 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-2238/7962/8408
Facsimile: (213) 894-0142
E-mail: kyle.kahan@usdoj.gov
kellye.ng@usdoj.gov
jason.gorn@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LERMA, *et al.*,
[#1 MICHAEL LERMA]
[#6 CARLOS GONZALEZ]
[#7 JUAN SANCHEZ]
[#8 JOSE GONZALEZ]

Defendants.

No. 2:18-CR-00172(A)-GW-1, 6, 7, 8

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING DOCUMENTS;
DECLARATION OF KYLE W. KAHAN

Plaintiff United States of America, by and through its counsel of record, the First Assistant United States Attorney for the Central District of California and Assistant United States Attorneys Kyle W. Kahan, Kellye Ng, and Jason Gorn hereby applies ex parte for an order that the government's legend identifying cooperating witnesses' names submitted concurrently with its omnibus opposition to defendants' Rule 29 and 33 Motions be filed under seal.

//

1 This ex parte application is based upon the attached declaration
2 of AUSA Kyle W. Kahan.

3 Dated: November 3, 2025

Respectfully submitted,

4 BILAL A. ESSAYLI
5 First Assistant United States
6 Attorney

7 ALEXANDER B. SCHWAB
8 Assistant United States Attorney
9 Acting Chief, Criminal Division

10 /s/

KYLE W. KAHAN

JASON A. GORN

KELLYE NG

Assistant United States Attorneys

11 Attorneys for Plaintiff
12 UNITED STATES OF AMERICA
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF KYLE W. KAHAN

I, Kyle W. Kahan, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am the attorney representing the government in this case.

2. The government requests leave to file its legend identifying cooperating witnesses' names under seal. The document submitted concurrently with the government's omnibus opposition to defendants' Rule 29 and 33 motions contains sensitive cooperating witness information protected under the parties' March 21, 2022, and February 6, 2024 Protective Orders filed at Docket Nos. 787, 1134. Sealing is required to protect those individuals and their families, especially since the government's omnibus opposition goes into detail what each cooperating witness testified to. Disclosure of these documents would tend to endanger the safety of the witnesses and their family members. This is so because individuals who have engaged in criminal activities and prison inmates often retaliate against witnesses and their families.

//

//

//

//

//

//

//

//

//

//

3. Should the Court deny this application, the government requests that its legend not be filed, but be returned to the government.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on November 3, 2025.

Kyle W. Kahan
KYLE W. KAHAN